

No. 17-4399

United States Court of Appeals
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA,
Plaintiff-Appellee,

v .

SITESH BANSI PATEL,
Defendant-Appellant.

On Appeal from the United States District Court for the Western
District of
Virginia, Abingdon Division,
James P. Jones, District Judge

UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME

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Counsel for Appellant Sitesh Banshi Patel

Now comes Sitesh Bansi Patel (“Patel”) by his recently retained counsel and moves the Court to grant him a 30-day enlargement of time in which to file his opening brief and appendix, all without objection by the Appellee United States. This Motion rests on the following grounds.

1. Patel’s opening brief and the appendix are due October 11, 2017.

2. On or about September 11, 2017, Patel’s prior appellate counsel, Shon R. Hopwood, Esq. withdrew as counsel, apparently with the Court’s permission.

3. Since learning of Mr. Hopwood’s departure, Patel, who remains incarcerated, has searched diligently for new appellate counsel.

4. Patel retained Glenn, Feldmann, Darby & Goodlatte (“Glenn Feldmann”) as appellate counsel on September 26, 2017.

5. Glenn Feldmann needs additional time to compile the appendix, digest the trial transcript, consult by telephone with Patel and draft the opening brief.

6. Counsel for the United States, Randy Ramseyer, Esq. has informed Glenn Feldmann that the government does not object to a 30-day

extension of the existing deadline by which Patel must file the appendix and his opening brief.

WHEREFORE, Sitesh Patel respectfully requests that the Court enlarge the time in which he must file the Appendix and his opening brief to November 10, 2017.

Respectfully submitted,

Dated: September 27, 2017

s/ Paul G. Beers

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CERTIFICATE OF COMPLIANCE WITH RULE 27

1. This Motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because it contains 205 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(a)(7)(B)(iii).
2. This Motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman, Size 14.

September 27, 2017

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of September, 2017, I caused this Motion to be filed electronically with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF user:

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September 27, 2017

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